<u>**REMARKS/ARGUMENTS**</u>

The claims have been amended as set forth above. Applicants believe that the amendments to the claims include allowable subject matter. Applicants respectfully request reconsideration of the claims.

I.   <u>**Examiner Interview April 16, 2008**</u>

An interview was held on April 16, 2008. During the interview, independent claim 1 was discussed in light of Figures 3 and 4. Applicants believe that an agreement was reached that the current changes overcome the cited reference. Examiner Tsui indicated that he would speak with his supervisor about possibly allowing the case.

II.   <u>**Information Disclosure Statement**</u>

The Office Action states that the information disclosure statement filed on 11/16/07 fails to comply with 37 CFR 1.97, 1.98 and MPEP § 609. The Office Action states that one reference did not include a year and that several other references were not received. An IDS to remedy any issues is forthcoming.

III. <u>**Rejection Under 35 U.S.C. § 103**</u>

Claims 1-4, 6-8 are rejected under 35 U.S.C. § 103(a) as being unpatentable over IJDAR, published: November 7, 2000, pages 6-12, by Altamura et al. (hereinafter "Altamura") in view "Star Office XML File Format Working Draft", pages 19, 89, 142, and 234, published: January 2001 by Sun Macro (hereinafter "Sun Macro"), and further in view of XML.com, published June 8, 2001, pages 1a and 1, by Eisenberg (hereinafter "Eisenberg"). Claims 11 and 22 are rejected under 35 U.S.C. § 103(a) as being unpatentable over IJDAR, published: November 7, 2000, pages 6-12, by Altamura; "Star Office XML File Format Working Draft", pages 19, 89, 142, and 234, published: January 2001 by Sun Macro; XML.com, published June 8, 2001, pages 1a and 1, by Eisenberg; DFKI, published, September 25, 2000, pages 1a, 3, 4, and 11, by Klink et al. (hereinafter "Klink"); and further in view of U.S. Patent No. 6,725,426 issued to Pavlov (hereinafter "Pavlov"). In light of the above amendments and the remarks herein, applicants

respectfully disagree with the rejections. Independent claim 1 includes the following

combination of features that is not taught or otherwise suggested by the cited references:

> determining properties corresponding to a mini-document that relates to at least
> one section of an application document, wherein the mini-document includes a
> body portion, wherein the mini-document includes at least one member of a group
> comprising: a header and a footer;
>
> mapping the properties of the mini-document into a markup language element
> *that is stored with each of the markup language section properties of the*
> *application document,* wherein mapping the properties includes:
>
>> *setting an option element in the mini-document markup language*
>> *element,* wherein the option element includes at least one member of a
>> group comprising: a header value and a footer value,
>>
>> *setting a type attribute in the mini-document markup language* element,
>> wherein the type attribute includes a value that indicates an occurrence
>> pattern of the body of the mini-document within the application document,
>> wherein upon rendering the markup language document, the type attribute
>> causes the body portion of the mini-document to be repeated in the
>> application in accordance with the occurrence pattern, wherein the value is
>> at least one member of a group comprising: an odd page value and an even
>> page value,
>>
>> setting page size properties of the application document in the section
>> properties of the application document, wherein the page size properties
>> includes a size value of the page, and
>>
>> *setting a margin properties of the application document in the section*
>> *properties of the application document, wherein the margin properties*
>> *include a top margin value, a bottom margin value, a left margin value,*
>> *a right margin value and a position value of the location of the mini-*
>> *document within the section of the application document;*
>
> storing the properties of the mini-document in the markup language document;
> and
>
> *validating the markup language document in accordance with a schema having*
> *definitions for the mini-document, wherein the definitions for the mini-*
> *document include a definition for headers, a definition for footers, a definition*

for a context free chunk, a definition for a paragraph element, a definition for a
table element and a definition for a mini-document type.

The references do not teach or otherwise suggest the above combination of features. Altamura teaches transformation of HTML formats into XML formats. With regard to XML document structures, Altamura teaches a document-type definition as indicated in paragraph P8-1. Altamura continues by teaching an example XML file that is generated for the document in Fig. 3 as indicated in section P9-3. In the Sun Macro Star Office reference, Sun Macro teaches a footnote label and that footnote citation elements can be labeled or numbered. (See Sun Macro, p. 142). Eisenberg describes page sequencing to specify the order of page masters. A document consists of a cover page followed by the contents. In a published book, even-numbered pages are left-hand pages and odd-numbered pages are right-hand pages. With regard to Klink, Klink describes a rule base approach for document structure recognition with an exchangeable rule base adaptable to several domains. Common structures like headers and footers are recognized independently. An upper portion of the document is scanned to determine whether a header exists. Likewise, a bottom portion of the document is scanned to determine whether a footer exists. With regard to Pavlov, Pavlov describes translating between word processing documents and XML documents. Content is retrieved from an XML database and is passed by a content management subsystem to a publishing engine. The publishing engine passes the retrieved content to a server. The server includes executable application programs that apply a style sheet to the content to format the content into a style appropriate for a device that requested the content.

The features associated with independent claim 1 are not found or otherwise suggested in the cited references. In particular, none of the references teach or otherwise suggest the structure of the markup language document as indicated in independent claim 1. None of the references teach or otherwise suggest mapping the properties of the mini-document into a markup language element that is stored with each of the markup language section properties of the application document. Also, none of the references teach or otherwise suggest the manner of mapping the properties as indicated in independent claim 1. Applicants can find no teaching or suggestion of the combination of "setting an option element in the mini-document markup language element,"

"setting a type attribute in the mini-document markup language," in combination with "setting a margin properties of the application document in the section properties of the application document, wherein the margin properties include a top margin value, a bottom margin value, a left margin value, a right margin value and a position value of the location of the mini-document within the section of the application document." Furthermore, applicants can find no teaching or suggestion that the type attribute includes a value that indicates an occurrence of the body of the mini-document. There is no teaching or suggestion that this value is at least one member of a group comprising: an odd page value and an even page value. Moreover, independent claim 1 has been amended to recite "validating the markup language document in accordance with a schema having definitions for the mini-document, wherein the definitions for the mini-document include a definition for headers, a definition for footers, a definition for a context free chunk, a definition for a paragraph element, a definition for a table element and a definition for a mini-document type." There is no teaching in the references of such a schema. Accordingly, applicants believe that the above changes to independent claim 1 render the claim allowable over the cited references.

Independent claim 10 includes the following combination of features that is not taught or otherwise suggested by the cited references:

> determining properties relating to a mini-document used within a word-processing document, wherein the mini-document includes a body portion having text;
>
> determining whether the mini-document is at least one member of a group comprising: a header and a footer;
>
> writing the properties into ***each of the section properties markup language elements associated with the word processing document***, wherein writing the properties includes:
>
>> ***writing an option element in the mini-document markup language element,*** wherein the option element includes at least one member of a group comprising: a header value and a footer value,
>>
>> ***setting a type attribute,*** wherein the type attribute includes a value that indicates an occurrence pattern of the body of the mini-document within

the application document, wherein upon rendering the markup language document, the type attribute causes the body portion of the mini-document to be repeated in the application in accordance with the occurrence pattern, and

setting a margin properties of the application document in the section properties of the application document, wherein the margin properties include a numerical position value of the location of the mini-document within the section of the word-processing document;

storing the properties in the markup language document such that the headers and footers of the word-processing document are substantially maintained when the markup language document is parsed by an application.

The references do not teach or otherwise suggest the above combination of features. Altamura teaches transformation of HTML formats into XML formats. With regard to XML document structures, Altamura teaches a document-type definition as indicated in paragraph P8-1. Altamura continues by teaching an example XML file that is generated for the document in Fig. 3 as indicated in section P9-3. In the Sun Macro Star Office reference, Sun Macro teaches a footnote label and that footnote citation elements can be labeled or numbered. (See Sun Macro, p. 142). Eisenberg describes page sequencing to specify the order of page masters. A document consists of a cover page followed by the contents. In a published book, even-numbered pages are left-hand pages and odd-numbered pages are right-hand pages. With regard to Klink, Klink describes a rule base approach for document structure recognition with an exchangeable rule base adaptable to several domains. Common structures like headers and footers are recognized independently. An upper portion of the document is scanned to determine whether a header exists. Likewise, a bottom portion of the document is scanned to determine whether a footer exists. With regard to Pavlov, Pavlov describes translating between word processing documents and XML documents. Content is retrieved from an XML database and is passed by a content management subsystem to a publishing engine. The publishing engine passes the retrieved content to a server. The server includes executable application programs that apply a style sheet to the content to format the content into a style appropriate for a device that requested the content.

The features associated with independent claim 10 are not found or otherwise suggested in the cited references. In particular, none of the references teach or otherwise suggest the structure of the markup language document as indicated in independent claim 10. Applicants can find no teaching or suggestion in any of the references of "writing the properties into each of the section properties markup language elements associated with the word-processing document." Applicants can find no teaching or suggestion within the references of writing an option element in the mini-document language element. Also, applicants can find no teaching or suggestion of setting a type attribute, wherein the type attribute includes a value that indicates an occurrence pattern of the body of the mini-document within the application document. Moreover, the references do not teach or otherwise suggest "setting a margin properties of the application document in the section properties of the application document, wherein the margin properties include a numerical position value of the location of the mini-document within the section of the word-processing document." Applicants can find no teaching or suggestion of the numeral position value within the references. Accordingly, applicants assert that independent claim 10 is in condition for allowance.

Independent claim 18 includes the following combination of features that is not taught or otherwise suggested by the cited references:

a processor; and

a memory associated with computer-executable instructions configured to:

determine properties relating to a mini-document included in at least one section of an application document, wherein the mini-document includes a body portion having text;

determine whether the mini-document is at least one member of a group comprising: a header and a footer;

map the properties into a markup language element that is stored with markup language section properties of the sections of the application document,
wherein mapping the properties includes:

14

> ***setting an option element in the mini-document markup language
> element,*** wherein the option element includes at least one member of a
> group comprising: a header value and a footer value,
>
> ***setting a type attribute,*** wherein the type attribute includes a value that
> indicates an occurrence pattern of the body of the mini-document within
> the application document, wherein upon rendering the markup language
> document, the type attribute causes the body portion of the mini-document
> to be repeated in the application in accordance with the occurrence pattern,
>
> ***setting a margin properties of the application document in the section
> properties of the application document, wherein the margin properties
> include a position value of the location of the mini-document within the
> section of the application document,*** and
>
> store the properties in the markup language section properties of the
> application document; and

a validation engine configured to validate the markup language document.

The references do not teach or otherwise suggest the above combination of features. Altamura teaches transformation of HTML formats into XML formats. With regard to XML documents structures, Altamura teaches a document-type definition as indicated in paragraph P8-1. Altamura continues by teaching an example XML file that is generated for the document in Fig. 3 as indicated in section P9-3. In the Sun Macro Star Office reference, Sun Macro teaches a footnote label and that footnote citation elements can be labeled or numbered. (See Sun Macro, p. 142). Eisenberg describes page sequencing to specify the order of page masters. A document consists of a cover page followed by the contents. In a published book, even-numbered pages are left-hand pages and odd-numbered pages are right-hand pages. With regard to Klink, Klink describes a rule base approach for document structure recognition with an exchangeable rule base adaptable to several domains. Common structures like headers and footers are recognized independently. An upper portion of the document is scanned to determine whether a header exists. Likewise, a bottom portion of the document is scanned to determine whether a footer exists. With regard to Pavlov, Pavlov describes translating between word processing documents and XML documents. Content is retrieved from an XML database and is passed by a content management subsystem to a publishing engine. The publishing engine

passes the retrieved content to a server. The server includes executable application programs that apply a style sheet to the content to format the content into a style appropriate for a device that requested the content.

The features associated with independent claim 18 are not found or otherwise suggested in the cited references. In particular, none of the references teach or otherwise suggest the structure of the markup language document as indicated in independent claim 18. Applicants can find no teaching or suggestion in any of the references to "map the properties into a markup language element that is stored with markup language section properties of the sections of the application document." Applicants can find no teaching or suggestion within the references of setting an option element in the mini-document language element. Also, applicants can find no teaching or suggestion of setting a type attribute, wherein the type attribute includes a value that indicates an occurrence pattern of the body of the mini-document within the application document. Moreover, the references do not teach or otherwise suggest "setting a margin properties of the application document in the section properties of the application document, wherein the margin properties include a position value of the location of the mini-document within the section of the application document." Accordingly, applicants assert that independent claim 18 is allowable over the cited references.

With regard to the dependent claims, the dependent claims include features that are not taught or otherwise suggested by the cited references. Furthermore, those claims ultimately depend from the independent claims above. As such, they should be found allowable for at least those same reasons.

IV.   Request for Reconsideration

In view of the foregoing amendments and remarks, all pending claims are believed to be allowable and the application is in condition for allowance. Therefore, a Notice of Allowance is respectfully requested. Should the Examiner have any further issues regarding this application, the Examiner is requested to contact the undersigned attorney for the applicant at the telephone number provided below.

Respectfully submitted,

MERCHANT & GOULD P.C.
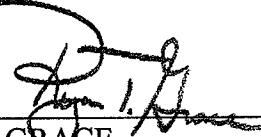
RYAN T. GRACE
Registration No. 52,956
Direct Dial: 402.344.3000

MERCHANT & GOULD P.C.
P. O. Box 2903
Minneapolis, Minnesota 55402-0903
206.342.6200

<div style="border:1px solid black; display:inline-block; text-align:center;">

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PATENT TRADEMARK OFFICE
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